

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ALEXANDER REENTS, individually and on)	
behalf of all others similarly situated)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 1:24-cv-07156
)	
MEDGUARD ALERT, INC. .)	
)	
)	
Defendant.)	
)	

**DEFENDANT’S UNOPPOSED MOTION
TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant MedGuard Leads, Corp. (“MedGuard”), through its counsel, Peter C. Morse, hereby moves this court to grant an extension of twenty one- (21) days for MedGuard to file its response to Plaintiff’s Complaint.

In support of this Stipulation, the parties certify to the Court as follows:

1. Plaintiff filed its Complaint in this Court on August 13, 2024.
2. MedGuard was served with the Summons and Complaint on August 22, 2024.
3. MedGuard’s response to Plaintiff’s Complaint is currently due on September 12, 2024. Thus, the time within which MedGuard must file its responsive pleading has not yet expired.
4. MedGuard needs additional time to prepare its response to the Complaint. In addition, MedGuard has recently retained counsel and is engaging in settlement discussions with the Plaintiff.
5. Plaintiff’s counsel has stipulated to this extension of twenty-one (21) days, up to

and including October 3, 2024, in which MedGuard must file its response to Plaintiff's Complaint.

6. This is the first request for an extension of time filed by MedGuard.

I certify that, upon filing this Motion with the court, a copy will be provided to Plaintiff's counsel by email.

Wherefore, the Defendant, MedGuard Alert, Inc. respectfully prays that this court extend the time for MedGuard to respond to Plaintiff's Complaint to October 3, 2024.

Respectfully submitted this 12th day of September 2024.

By: /s/ Peter S. Morse
THE MORSE LAW FIRM, LLC
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2024, I delivered the foregoing Answer via electronic case filing notice, to:

Anthony L Paronich

Paronich Law, P.C.

350 Lincoln St, Suite 2400

Hingham, MA 02043

Anthony@paronichlaw.com

Attorney for Plaintiff

/s/ Peter C. Morse